BEFORE THE AMERICAN ARBITRATION ASSOCIATION

North American Court of Arbitration for Sport Panel

United States Anti-Doping Agency, Claimant, v. Floyd Landis, Respondent	)	AAA No. 30 190 00847 06

USADA'S INITIAL DESIGNATION OF WITNESSES

The United States Anti-Doping Agency ("USADA"), identifies the following witnesses that USADA may call to testify at the hearing in this matter. Set forth below is a general summary of each witness's anticipated testimony. USADA reserves the right to supplement these statements as requested by the Panel or as otherwise necessary. USADA has included the curriculum vitae ("CV") for each scientific expert. USADA may not call all of the witnesses identified, particularly where USADA determines that testimony may be duplicative or where USADA is able to reach a stipulation with Respondent regarding non-contested matters. Further, consistent with the Panel's scheduling order, USADA reserves the right to name additional witnesses after receiving Respondent's designation of Respondent's witnesses and in the event additional witnesses are disclosed or necessitated as the result of responses to USADA's pending discovery requests.

1. **Dr. Cedric Shackleton, Children's Hospital Oakland Research Institute.** Dr. Shackleton is one of the world's leading experts in the field of steroid metabolism. He has also published in the area of the use of IRMS to detect exogenous testosterone use. (CV attached).

Dr. Shackleton will testify regarding a brief summary of his experience and background as set forth in his curriculum vitae. Dr. Shackleton will also testify based on his experience, research and review of documents in this case.

Dr. Shackleton's testimony will be directed to the following general areas: the metabolism of testosterone generally and testosterone metabolism in the context of Mr. Landis' IRMS results; and, the use of IRMS analysis to detect doping with exogenous testosterone.

Specific points which will be addressed by Dr. Shackleton include but are not limited to his opinions and the basis for those opinions that a significant difference between one single metabolite - endogenous reference compound pair provides a sufficient scientific basis for a positive IRMS test.

It is anticipated that Dr. Shackleton will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

2. **J. Thomas Brenna, Ph.D., Professor of Nutritional Science, Cornell University.** Dr. Brenna is one of the world's leading experts on IRMS analysis. Dr. Brenna has expertise in the use of IRMS analysis to detect the existence of exogenous testosterone and has significant expertise related to software related to IRMS analysis. He will testify regarding the accuracy and reliability of the data provided by LNDD regarding Respondent's samples. He will also provide testimony regarding the operation of IRMS instrument, software and the relevant quality controls related to the analysis. If necessary, he will testify regarding the reprocessing of the samples that occurred at the request of Respondent. (CV attached.)

It is anticipated that Dr. Brenna will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

3. **Dr. Christiane Ayotte, Director Montreal WADA Accredited Laboratory** Dr. Ayotte will testify regarding a brief summary of her experience and background as set forth on her curriculum vitae and the experience and research of the Montreal laboratory. Dr. Ayotte will also provide testimony based on her participation as a member of the WADA Laboratory Committee and various sub-committees and her participation as a scientific review advisor for the International Amateur Athletic Federation. Dr. Ayotte's testimony will also be based on her research and experience in the area of identification of exogenous testosterone through GC/MC (T/E Ratio) and IRMS, and her review of exhibits in this case. (CV attached).

Dr. Ayotte's testimony will be directed to the following general areas: the use of IRMS analysis to detect doping with exogenous testosterone; the use of GC/MS analysis to detect doping with exogenous testosterone; the IRMS analysis of sample #995474; the T/E analysis of sample #995474 and the longitudinal study related to that sample; and, the IRMS analysis of the ten samples which were analyzed at LNDD starting on April 16, 2007.

Specific points which will be addressed by Dr. Ayotte include, but are not limited to, her opinions and the basis for those opinions that:

- The WADA criteria under TD2004EAAS is satisfied if any metabolite – ERC combination has a delta/delta value of more than -3 delta units. She will further discuss the underlying scientific basis for WADA's determination of the criteria in TD2004EAAS.

- Sample #995474 would have been declared an Adverse Analytical Finding based on IRMS analysis if it had been analyzed at the Montreal laboratory.

- The IRMS method used by LNDD complies with the International Standard for Laboratories ("ISL") and the Sample A & B IRMS results for sample #995474 establish an Adverse Analytical Finding.

- The fact that both LNDD's IRMS and T/E methods are specifically included in its scope of ISO's accreditation means that ISO, as and independent body, has determined that LNDD's use of these methods produces reliable results and that LNDD has done all necessary validation for those methods. Under the WADA accreditation scheme, both WADA's and ISO's accreditation are important safeguards for establishing the reliability of a laboratory's analytical results.

- The reliability of LNDD's IRMS analytical results and are completely and separately independent from LNDD's T/E ratio results.

- The results reported by LNDD on the ten samples that were analyzed starting April 16 are reliable and establish the use of exogenous testosterone in four of those samples.

- LNDD's GC/MS confirmation of the T/E ratio in sample #995474 is reliable evidence that Mr. Landis had an abnormally high T/E ratio of around 11 which is not consistent with his longitudinal profile. The T/E ratio in sample #995474 strongly supports the IRMS finding of exogenous testosterone use.

- The fact that Mr. Landis' measured testosterone was not abnormally high does not mean that he was not doping with testosterone or its precursors.

- LNDD's bottle chain of custody documentation satisfies the requirements of the International Standard for Laboratories and the related WADA Technical Document.

- Based on the Montreal Laboratory's experience receiving doping control forms from numerous anti-doping organizations and sports, it is universally the case that the portion of the doping control form containing medical declarations is sent to the laboratory. Most of the forms received list numerous medications or supplements taken.

It is anticipated that Dr. Ayotte will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

4. **Dr. Rodrigo Aguilera, Researcher Scientist, House Ear Institute, Proteomics Core Facility, Los Angeles, California.** Dr. Aguilera was one of the pioneers in the application of IRMS to identify the use of exogenous testosterone. Dr. Aguilera will testify regarding a brief summary of his research experience and background as set forth in his curriculum vitae. (CV attached).

Dr. Aguilera will also testify based on his experience, research, review of documents in this case and his personal observation of the further analysis of samples which took place on April 16.

Dr. Aguilera's testimony will be directed to the following general areas: the IRMS analysis of the ten samples which were analyzed at LNDD starting on April 16, 2007; the use of

IRMS analysis to detect doping with exogenous testosterone; and, the IRMS analysis of sample #995474.

Specific points which will be addressed by Dr. Aguilera include but are not limited to his opinions and the basis for those opinions that based on his direct observation and review of the documentation package for sample #995474 and for the further analysis samples, LNDD's analytical methods are of high quality and their results are reliable.

It is anticipated that Dr. Aguilera will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

He may also testify concerning the matters addressed the declarations that he and other LNDD personnel provided in support of USADA's opposition to Respondent's motion in limine to exclude the results of the analyses of the other B samples.

5. **Hans Geyer, Ph.D., Deputy Head, Institute of Biochemistry of the German Sports University Cologne.** Dr. Geyer will testify regarding a brief summary of his experience and background as set forth in his curriculum vitae. His testimony will also be based on his research, experience and his review of documents in this case. (CV attached).

Dr. Geyer's testimony will be directed to the following general areas: The use of GC/MS analysis to detect doping with exogenous testosterone; and, the T/E analysis of sample #995474 and the longitudinal study related to that sample.

Specific points which will be addressed by Dr. Geyer include but are not limited to his opinions and the basis for those opinions that:

- The confirmation T/E ratios in sample #995474 in the 11.0 range are highly abnormal.

- The screen T/E values reported for sample #995474 are also significantly elevated even though the reported values are too low because the reported epitestosterone value is affected by a coeluting peak which makes the T/E ratio artificially low.

- When Mr. Landis' historical T/E ratio values (in tests where the screen value is supported by a clear chromatogram) are compared to either the screen value or confirmation value of sample #995474 the significant difference provides strong evidence of manipulation with testosterone or its prohormones. This longitudinal analysis of Mr. Landis' steroid profile provides strong evidence to support the adverse analytical finding based on IRMS.

- There is no evidence that sample #995474 was degraded.

It is anticipated that Dr. Geyer will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

6. **Wilhelm Schänzer, Ph.D., Director, Institute of Biochemistry of the German Sports University Cologne.** Dr. Schänzer will testify regarding a brief summary of his experience and background as set forth in his curriculum vitae. His testimony will also be based on his experience, research and the review of documents in this case. (CV attached).

Dr. Schänzer's testimony will be directed to the following general areas: the use of IRMS analysis to detect doping with exogenous testosterone; and, the IRMS analysis of sample #995474. Dr. Schänzer may also address the IRMS analysis of the ten samples which were analyzed at LNDD starting on April 16, 2007.

Specific points which will be addressed by Dr. Schänzer include but are not limited to his opinions and the basis for those opinions that:

- If sample #995474 would have been analyzed in the Cologne laboratory it would have been reported as an Adverse Analytical Finding for the presence of exogenous testosterone or its prohormones.
- LNDD's IRMS method is scientifically reliable.
- The IRMS' results reported by LNDD can be relied upon to establish an Adverse Analytical Finding.
- Sample deterioration does not affect IRMS results.
- Based on Cologne's research, when testosterone gel is applied, 5 alpha diol is better than the other three metabolites used by LNDD to detect the exogenous use of testosterone.

It is anticipated that Dr. Schänzer will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

7. **Don H. Catlin, M.D., Professor Emeritus of Molecular and Medical Pharmacology and Former Founder and Director, Olympic Analytical Laboratory, UCLA.** Dr. Catlin will testify regarding a brief summary of his experience and background as set forth on his curriculum vitae. Dr. Catlin's testimony will also be based on his research and experience identifying exogenous testosterone through GC/MS (T/E ratio) and IRMS analysis and his review of documents in this case. (CV attached).

Dr. Catlin's testimony will be directed to the following general areas: the use of IRMS analysis to detect doping with exogenous testosterone; the use of GC/MS analysis to detect doping with exogenous testosterone; the IRMS analysis of sample #995474; the longitudinal study related to sample #995474; and, the IRMS results of the ten samples which were analyzed at LNDD starting on April 16, 2007.

Specific points which will be addressed by Dr. Catlin include, but are not limited to, his opinions and the basis for those opinions that:

- Mr. Landis' sample #995474 IRMS results are a clear positive case and would be reported positive by the UCLA laboratory.

- In sample #995474 the delta/delta difference between 5 alpha diol-pdiol which is greater than 6 is exceptionally large.

- Conducting IRMS analysis with the metabolites 5 alpha diol and 5 beta diol is more time consuming than simply relying on the metabolites andro and etio. However, UCLA's research has shown that these two diols and particularly 5 alpha diol, are better able to detect exogenous testosterone use. This research has further shown that in some cases the 5 alpha diol–pdiol combination is the only analysis able to detect the exogenous use of testosterone.

- IRMS analysis is able to detect exogenous testosterone in samples where the T/E ratio is less than 4.

- Mr. Landis' T/E time profile when compared to the T/E ratio found in sample #995474 is also very compelling evidence of manipulation with testosterone or its precursors.

It is anticipated that Dr. Catlin will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

8. <u>Ray Kazlauskas</u>, Director, Australian Sports Drug Testing Laboratory

Dr. Kaslauskas will testify regarding a brief summary of his experience and background as set forth in his curriculum vitae, his review of documents in this case and the research and experience of the Sidney Laboratory with IRMS analysis. Dr. Kaslauskas will testify generally about the use of IRMS to detect doping with exogenous testosterone. Dr. Kaslauskas will also testify based on the Sidney Laboratory's experience, research and the results reported by LNDD.

Specific points which will be addressed by Dr. Kaslauskas include but are not limited to his opinions and the basis for those opinions that:

- The Sydney Laboratory will report an Adverse Analytical Finding base on a significant difference in a single metabolite - endogenous reference compound combination.

- If the Sidney Laboratory would have been responsible for analyzing samples for the Tour de France sample #995474 it would have been reported as a positive test.

- The delta/delta value of over -6 in sample #995474 for 5 alpha diol-pdiol is a very high delta/delta value which is a clear basis for an adverse analytical finding for exogenous testosterone or its precursors.

- Sample deterioration has no effect on IRMS values.

It is anticipated that Dr. Kazlauskas will review any conclusions offered or testimony give by Respondent's experts and will address any issues or defenses raised by Respondent and/or his experts as needed, including, if necessary, through rebuttal testimony.

9. **Janine Jumeau, Analytical Precision, Ltd.** Janine Jumeau was a Product Engineer for VG Isogas and Product Manager for VG Isotech. In this role, she was responsible for the development of the Isochrom IRMS (the predecessor of the Isoprime) and the design of the interface between a gas chromatograph and an isotope ratio mass spectrometer. She had an active role in research and development at VG, including the evaluation of the Isochrom OS/2-based software system. As such, she can provide information about the reliability of the Isochrom v 1.67-2 software as applied to the Isoprime IRMS used by LNDD. Ms. Jumeau will testify regarding the reliability of the Isoprime IRMS on the days of the "A" and "B" analysis based on the results of controls and standards run on those days. She can also provide information regarding the lack of impact of instrument linearity on the results in question. Ms. Juneau can also provide information regarding the operation of IRMS instrument. (CV attached).

10. **Stuart Cram, Associate Program Leader for the Chemical and Biological National Security Program in the nonproliferation, Arms Control, International Security Directorate, Lawrence Livermore National Laboratory.** Dr. Cram was Worldwide Sports Medicine Marketing Manager for Agilent Technologies from 1996 until his retirement in 2005. Dr. Cram has extensive knowledge of chromatography and mass spectrometry, and the data reduction systems utilized on the Agilent GC/MS systems such as that used for the analysis of the T/E ratio. If necessary, Dr. Cram will testify regarding the appropriate use of the data produced by the Agilent GC/MS. Dr. Cram may also discuss issues related to peak area allocation. (CV attached).

11. **Cynthia Mongongu, LNDD Analytical Chemist.** Ms. Mongongu may testify regarding her role concerning Respondent's Stage 17 samples and/or Respondent's other B samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and any document provided Respondent in discovery.

She may also testify concerning the matters addressed in the declarations that she and other LNDD personnel provided in support of USADA's opposition to Respondent's motion in limine to exclude the results of the analyses of the other B samples.

12. **Claire Frelat, LNDD Analytical Chemist.** Ms. Frelat may testify regarding her role concerning Respondent's Stage B 17 sample and/or Respondent's other B samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel, and any document provided Respondent in discovery.

She may also testify concerning the matters addressed in the declarations that other LNDD personnel provided in support of USADA's opposition to Respondent's motion in limine to exclude the results of the analyses of the other B samples.

13. **Jacques de Ceaurriz, LNDD Director.** Dr. de Ceaurriz may testify regarding his role concerning Respondent's Stage 17 samples and other B samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which his name or initials appear and the events in which he is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel, and documents provided Respondent in discovery.

He may also testify concerning accreditation of LNDD by WADA, inspections and audits of LNDD by ISO, the competence of his staff, compliance with the International Standard for Laboratories, including Technical Documents, other LNDD quality control and quality assurance measures, standard operating procedures and LNDD security measures.

He may also testify concerning the matters addressed the declarations that he and other LNDD personnel provided in support of USADA's opposition to Respondent's motion in limine to exclude the results of the analyses of the other B samples.

14. **Esther Cerpolini, LNDD Analytical Chemist.** Ms. Cerpolini may testify regarding her role concerning Respondent's Stage 17 samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

15. **Ruddy Barlagne, LNDD Analytical Chemist.** Mr. Barlagne may testify regarding his role concerning Respondent's Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which his name or initials appear and the events in which he is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

16. **Agnes Gaillard, LNDD employee.** Respondent has requested Ms. Gaillard to testify on subjects presently unknown to USADA. USADA may have her testify concerning whatever subjects Respondent covers, including any activity reflected on any document provided Respondent in discovery

17. **Dr. Corinne Buisson, IRMS Supervisor LNDD**. Dr. Buisson may testify regarding her role concerning Respondent's Stage 17 samples and Respondent's other B samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel, and documents provided Respondent in discovery.

She may also testify concerning accreditation of LNDD by WADA, inspections and audits of LNDD by ISO, LNDD's standard operating procedures, the competence of Ms. Mongongu and Ms. Frelat in performing GCMS and IRMS analyses, compliance with the International Standard for Laboratories, including technical documents, other LNDD quality control, and quality assurance measures, standard operating procedures and LNDD security measures.

She may also testify concerning the matters addressed the declarations that she and other LNDD personnel provided in support of USADA's opposition to Respondent's motion in limine to exclude the results of the analyses of the other B samples.

18. **W. Rahali, Former LNDD Employee**. Ms. Rahali may testify regarding her role concerning Respondent's Stage 17 samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel, and documents provided Respondent in discovery.

19. **M. Garcia, LNDD Employee**. Ms. Garcia may testify regarding her role concerning Respondent's Stage 17 A sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

20. **Emilie Despres, LNDD Employee**. Ms. Despres may testify regarding her role concerning Respondent's Stage 17 A sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

21. **Franck Neveu, LNDD Employee.** Mr. Neveu may testify regarding his role concerning Respondent's Stage 17 A and B samples, including specifically the activities reflected on the documents in the Document Packages for such samples on which his name or initials appear and the events in which he is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

22. **Nathalie Méchin, LNDD Employee.** Ms. Mechin may testify regarding her role concerning Respondent's Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

23. **Laurent Martin, LNDD Employee.** Mr. Martin may testify regarding his role concerning Respondent's Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which his name or initials appear and the events in which he is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

24. **Marjorie Cariou, LNDD Employee**. Ms. Cariou may testify regarding her role concerning Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

25. **Aurélie Laurent, LNDD Employee.** Ms. Laurent may testify regarding her role concerning Respondent's Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

26. **Adeline Molina, LNDD Employee.** Ms. Molina may testify regarding her role in concerning Respondent's Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

27. **J. Alexia, LNDD employee.** Ms. Alexia may testify concerning her role in the handling, preparation, analysis, results reporting and/or documentation of Respondent's Stage 17 B sample, including specifically the activities reflected on the documents in the Document Packages for such samples on which her name or initials appear and the events in which she is identified as having been involved or allegedly involved in USADA's and Respondent's pre-hearing briefs, other pleadings filed with the Panel and documents provided Respondent in discovery.

28. **Phillipe Dautry.** Mr. Dautry will briefly describe his experience and position at the AFLD and the relationship between AFLD and the Paris laboratory.

Mr. Dautry's testimony will generally describe the following:

- That doping control forms for the 2006 Tour de France were sent to AFLD by the doping control officials collecting the samples in France through the mail. AFLD receives the white copy of the doping control form that includes the athlete's name. The laboratory receives another copy of the doping control form where the blocks containing the athlete's name and signature are not included. AFLD never received a

copy of the white doping control form containing Mr. Landis' name from the Paris laboratory.

- The handwritten changes, on page 0288 of the copy of the Paris laboratory documentation package which was given by AFLD to the lawyers for Mr. Landis, were not on the document when it was received from the Paris laboratory. In providing this copy of the documentation package to the lawyers of Respondent, AFLD had no intent to mislead anyone.

Mr. Dautry will also be available, as necessary, to rebut any other claims or defenses raised by Respondent.

29. **Greg LeMond, Three-Time Tour de France Winner.** Mr. LeMond will testify regarding conversations he had with Respondent and related events. Mr. LeMond may also testify in response to claims made by Respondent in his pre-trial brief and elsewhere regarding the merits of specific doping practices in professional cycling. Mr. LeMond will also be available, as necessary, to rebut any other claims or defenses raised by Respondent.

30. **Joseph Papp, Professional Cyclist.** Mr. Papp will testify in response to claims made by Respondent in his pre-trial brief and elsewhere regarding the merits of specific doping practices in professional cycling. More specifically, Mr. Papp will testify regarding the pattern and practice of doping and specifically the use of testosterone and related substances, in professional cycling. For example, Mr. Papp will testify regarding his own doping practices during stage races, in order to rebut claims by Respondent regarding the type of doping practices that are prevalent during professional stage races. Mr. Papp will also be available, as necessary, to rebut any other claims or defenses raised by Respondent.

31. **Floyd Landis, Respondent.** Mr. Landis is the Respondent in this matter and will be examined regarding all facts and circumstances related to his adverse analytical finding during Stage 17 of the 2006 Tour de France, including, but not limited to, all statements he has made related to this case..

32. **Collection Witnesses.** USADA has requested a stipulation from Respondent regarding collection, as we do not believe that there are any issues in dispute in this regard. Respondent has not provided a response to this request. If no stipulation can be reached, witnesses that would have information regarding collection include, but are not limited to, Laurent Bezault (ASO) – Tour de France logistics and sample collection; Dr. Gerard Bordaberry, collection doctor for Samples 995462, 994203, 994277, 995474, and 994080; Dr. Olivier Brochart, collection doctor for Sample 994276; Dr. Tollenaere, collection doctor for Samples 994075 and 994171; Jan Van Gestel (UCI) - present on behalf of the federation during sample collection for Samples 994276, 994075, 994171; Giovanni Meraviglia (UCI) - present on behalf of the federation during sample collection for 995462, 994203, 994277, 995474, 994080; David Foulon, courier employed by ASO during Tour de France for purpose of transporting coolers to and from collection sites at the different stages of the Tour and transport means (helicopter and airplane); Mr. Moussu, courier employed by ASO during Tour de France for purposes of transporting coolers to and from collection sites at the different stages of the Tour and transport means (helicopter and airplane); Mrs. Esperance Chevalier, flight attendant assigned by ASO to

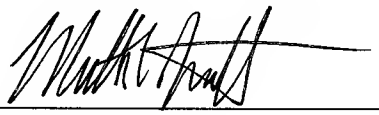
receive samples from couriers coming from sampling and supervise transport of samples until picked up by courier in Paris; Dominique Simonetti, Dynapost employee assigned to meet airplane in Paris each day of Tour and transport cooler with samples to LNDD. The descriptions given above are simply summaries of the types of roles each person played in collection as an indication of why he or she would be called as a witness; if any of these witnesses is called, USADA reserves the right to question such witnesses about any matter for which he or she has knowledge.

33. **Other USADA Witnesses.** USADA also designates for potential direct, cross, or rebuttal examination all witnesses designated, endorsed, or called by Respondent.

USADA reserves the right to call additional witnesses and/or expert witnesses as needed based on receiving the submission from Mr. Landis and also as necessary as unforeseen witnesses are identified by USADA or otherwise come forward with relevant information. USADA further reserves the right to call any witness necessary for impeachment or rebuttal.

Dated this 4th day of May, 2007.

United States Anti-Doping Agency



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of May, 2007, a true and correct copy of the foregoing **USADA'S INITIAL DESIGNATION OF WITNESSES** was served by Electronic Mail as follows:

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